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**From:** Charlotte Sanson [charlotte.sanson@bayer.com]  
**Sent:** 6/9/2017 8:14:54 PM  
**To:** Keigwin, Richard [Keigwin.Richard@epa.gov]  
**Subject:** Follow-Up

Hi Rick,

I appreciate the call back this afternoon. As follow up:

- I confirmed that the study EFED is referencing for the non-target plant endpoint is a formulated form of the degradate (Bayer submitted in response to Reg Review inquiry). It is not a registered formulation or the TEP, nor is it a typical approach for testing of metabolites (was conducted for EU purposes).
- EFED has done higher tier modeling, although in our opinion, used extremely conservative and unrealistic assumptions (i.e., all channelized flow).
- As I mentioned, off-labeling counties has significant challenges; sends mixed messages to growers who use IFT in corn in the same counties and creates issues with the States.
- As detailed in our benefits document, IFT is a resistance management tool for growers, and will be the first Group 27 chemistry available for use in soybeans. It controls or suppresses a broad array of grass and broadleaf weeds, many of which are resistant to other chemistries. The use rate is very low compared to other registered compounds.

I'll follow up with you again later on Monday to continue exploring a path forward.

Thanks.

Freundliche Grüße / Best regards,

Charlotte Sanson  
VP, Regulatory Affairs & Compliance, Crop Science

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